STATE OF ILLINOIS

ILLINOIS COMMERCE COMMISSION

LAZ Parking LTD, LLC)
-VS-)
Commonwealth Edison Company) Docket No. 12-0324
Complaint pursuant to Sections 9-250 and 10-108 of the Illinois Public Utilities Act and Section)
200.170 of the Rules of Practice of the Illinois Commerce Commission.)

Direct Testimony of

DERRICK E. MOORE

Senior Energy Technician

Commonwealth Edison Company

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1 I. <u>Introduction and Purpose</u>

- 2 A. <u>Identification of Witness</u>
- 3 Q. What is your name and business address?
- 4 A. Derrick E. Moore, Commonwealth Edison Company ("ComEd"), 1500 Franklin Blvd.,
- 5 Libertyville, Illinois 60048.
- 6 Q. By whom are you employed and in what capacity?
- 7 A. I am currently employed by ComEd as a Senior Energy Technician in the Field & Meter
- 8 Services ("F&MS") department. I have held this position since October 2007.
- 9 **B.** Purpose of Testimony
- 10 Q. What is the purpose of your direct testimony?
- 11 A. The purpose of my direct testimony is to explain what transpired on April 6, 2010 when I
- visited LAZ Parking LTD, LLC's ("LAZ") facility at 25 N. Michigan Ave. in Chicago,
- 13 IL ("LAZ Facility").
- 14 C. Summary of Conclusions
- 15 Q. Please summarize the conclusions of your direct testimony.
- 16 A. On April 6, 2010, I visited the LAZ Facility to: (1) verify the meter number for Meter
- No. 141362866, the LAZ meter involved in this case ("LAZ Meter"); and (2) verify the
- size and type of the current transformers ("CTs") in use with the LAZ Meter.
- 19 **D.** Identification of Exhibits
- 20 Q. Are you sponsoring any attachments to your direct testimony?
- 21 A. Yes. I have attached the following exhibits to my testimony:

- ComEd Exhibit ("Ex.") 2.01 is a true and correct copy of my June 7, 2013

 affidavit in support of Respondent's Motion to Dismiss the Complaint on the

 Merits.
 - ComEd Ex. 2.02 is a true and correct copy of my June 30, 2015 affidavit in support of Respondent's Motion for Summary Judgment.
 - **ComEd Ex. 2.03** is a true and correct copy of an Order Completion Data Report related to the LAZ Facility.

29 E. Background and Experience

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- 30 Q. Mr. Moore, please summarize your duties and responsibilities in your current position.
- A. In my current position as Senior Energy Technician, I am responsible for both installation and maintenance of meters and associated equipment, such as wiring of CTs. I am also involved with disconnection of service for nonpayment. I have been employed by ComEd since 1988, when I began my career as a meter reader.

36 II. The April 6, 2010 LAZ Facility Visit

- 37 Q. Why did you travel to the LAZ Facility on April 6, 2010?
- A. I was dispatched to the LAZ Facility with the purpose of obtaining information regarding
 the equipment in use by LAZ. Specifically, as reflected in the "Issuance Comments" of
 the Order Completion Data Report, attached hereto as ComEd Ex. 2.03, I was tasked with
 acquiring CT information for the LAZ Meter and updating ComEd's Customer
 Information & Marketing System ("CIMS") with that information.

43 Q. Was April 6, 2010 the first time a F&MS technician was dispatched to the LAZ 44 Facility for this purpose? No. As indicated on page 4 of the Order Completion Data Report, another F&MS 45 A. 46 technician was originally dispatched on March 10, 2010, but LAZ did not show up for the 47 appointment. 48 Q. How did you acquire the requested information? 49 First, I physically located the LAZ Meter. Then I recorded the serial number of the LAZ A. 50 Meter (141362866), its size (26), and model type (D3LS62). Next, I recorded the serial 51 numbers (006975984, 006975989, and 006975993), size (3,000), and ratio (600) of the 52 CTs in use with the LAZ Meter. 53 Q. How did you update CIMS with this information? 54 A. Once I completed the information collection, I entered everything into my Mobile 55 Dispatch Terminal ("MDT"), which is a laptop computer. This information is then 56 transferred to a F&MS clerk who inputs the data into CIMS. 57 Did you perform any additional tasks at the LAZ Facility on April 6, 2010? Q. 58 A. No. Does this conclude your direct testimony? 59 Q.

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A.

Yes.